UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

ADAM PLETCHER, SAMANTHA PLETCHER,

Plaintiffs,

Case No: 20-cv-811

v .

SPARKPLUG CAPITAL LLC,

Defendant.

JOINT MOTION FOR LEAVE TO AMEND THE ORDER FOLLOWING SCHEDULING CONFERENCE

Plaintiffs, Adam Pletcher and Samantha Pletcher, appearing pro se, and Defendant, Sparkplug Capital, LLC, by its attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, (collectively "Parties"), pursuant to the Federal Rules of Civil Procedure Rule 6(b) and 16(b)(4), hereby respectfully request that this Court grant leave to the Parties to amend the Order Following Scheduling Conference dated October 28, 2020 for good cause as follows:

- 1. On May 29, 2020, Plaintiffs filed their Complaint against Defendant. (Doc. 1).
- 2. On November 18, 2020, Defendant filed a Motion to Dismiss. (Doc. 16).
- 3. On December 11, 2020, Plaintiffs filed a Motion for Extension of Time to Oppose the Motion of Defendant to Dismiss the Complaint; the Motion was granted on December 15, 2020. (Doc. 19; Dec. 15, 2020 Text Only Order).
- 4. On December 30, 2020, Plaintiffs filed their Brief in Opposition to Defendant's Motion to Dismiss. (Doc. 21).
- 5. On January 13, 2021, Defendant filed its Reply Brief in Support of its Motion to Dismiss. (Doc. 22).

- 6. On January 27, 2021, Plaintiffs filed their Response to Defendant's Reply Brief in Support of its Motion to Dismiss. (Doc. 23.)
- 7. On February 3, 2021, this Court entered an Order, denying Defendant's Motion to Dismiss. (Doc. 24).
 - 8. The Parties are working diligently through the discovery process.
- 9. No prior extensions or changes to the Order Following Scheduling Conference have been requested.
- 10. The Parties have stipulated and agreed to extend the Order Following Scheduling Conference deadlines as follows:
 - a. Defendant shall have until no later than April 30, 2021 to name lay and expert witnesses and produce reports.
 - b. All requests for discovery shall be served by a day sufficiently early so that all discovery in this case can be completed no later than May 31, 2021.
 - c. Any dispositive motions must be served and filed on or before May 31, 2021.
- 11. A proposed Order consistent with this Joint Motion for Leave to Amend the Order Following Scheduling Conference is filed herewith for the Court's convenience.

WHEREFORE, Plaintiffs and Defendant respectfully request that this Court grant their Joint Motion for Leave to Amend the Order Following Scheduling Conference extending the deadlines of the Order Following Scheduling Conference as requested, stipulated, and agreed to above.

Dated this 15th day of March, 2021.

PRO SE PLAINTIFFS

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Dated this 15th day of March, 2021.

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